

Larry,

I'm representing the viewpoint from a small hospital that contracts with a copy service to provide all of our record copy needs. I have put this email together with input from our copy service representative.

Listed below are considerations that should be made when identifying what the uniform fee should be.

1. Medical record mediums and retrieval: The uniform fee should take into consideration the cost involved in retrieving medical records that are stored differently. For instance, if the medical record has to be pulled from off-site storage and the storage company charges the hospital \$30 to retrieve the medical record, the requestor should be required to pay this "archival fee." If the medical records are on microfilm or on an imaging system, at some point it cost the hospital a significant amount of money to convert the records to that format. The hospital could have chosen to retain the medical records for only as long as the state retention guidelines requires, thus making many records unavailable.
2. Regional cost: Most people believe that it might cost less to perform Release of Information in a hospital in a small town (Baraboo) than it does in a city (Milwaukee); however, this reduced cost is usually for the staffing only. The cost of storage, support, supplies, equipment... are still the same in Baraboo vs. Milwaukee because most of these services are provided from a city. As a side note, our copy service employee at St. Clare makes more than most of the copy abstractors in Milwaukee because we require more skills from her (self-starter, ability to work independently...) than we do from the employees that have direct supervision.
3. Operating expenses: Operating expenses such as wages, rent, utilities, duplicating expenses, administrative costs for management, legal costs, and insurance costs all need to be considered. Collection costs and losses due to non-payment of fees should be factored and wages need to include both hourly paid amounts and benefits.
4. Sequence of steps for duplicating healthcare records: See the WHIMA document submitted by Chrisann Lemery. The mistake to be avoided is to only consider what the cost might be for a person to stand at a machine and produce duplicate health care records. Duplicating health care records is a process, not just a function. Costs need to reflect that process, not the mere generation of a paper copy. Requests come by phone, fax and mail. Authorizations and releases need to be checked and logged. Computer software and hardware are needed to create and maintain these logs. Generation of copy may have to be done on a copy machine, from a fiche or film reader, or from an electronic database.
5. Impact on cost in advancement of technology: This would include the consideration for electronic medical records. It may be easier to print a copy of an electronic record, but consideration must be given to the cost of implementing electronic medical record software and hardware.

6. Hospital impact: Our copy service provides us with full-service Release of Information services with no cost to the hospital. They provide the support, training, collections, software, management, labor, supplies, and equipment. If the uniform fee is less than what they currently charge, they would be forced to decrease the level of service or charge the hospitals the difference to make up for costs. Hospitals in Wisconsin would be faced with having to increase their budget to accommodate the costs they would incur from having to subsidize the Release of Information company.

As the DHFS tries to determine uniform fees, it must be emphasized that duplicating health care records is a process, not a function of feeding paper into a machine. The health care providers should be able to pass those costs attached to the process to those making requests for copies of health care records. Requestors of medical records must be made aware that the cost involved in copying medical records is not minimal and does not compare to making copies at Kinkos.

Thanks for the opportunity to write this email

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